

## REMARKS

Claims 1-3, 5-10, and 12-18 are pending in the application and the same are rejected. Claims 1-3, 5-10, and 12-18 remain in the application and are presented for review and further consideration by the Examiner.

The Examiner has rejected claims 1-3, 5-10 and 12-18 under 35 U.S.C. §102(e) as being anticipated by Franklin et al., U.S. Publication No. US 2001/0023440 A1. (Examiner's Final Action, page 3, ¶ 4).

Applicant respectfully disagrees.

Franklin discloses a directory services system 80. The directory services system 80 includes resources 22. Each resource 22 in the system has an application object 100. Each application object 100 contains attributes 110 of the resource 22. The attributes 110 may reflect a measurement, context, a time position, or time for access, spatial position, organizational identification, logical position, or geographical identifier for identifying a proximity of an application object 100 with respect to a coordinate system locating another object.

The Examiner suggests that the geographical identifier in Franklin is inherently known as a coordinate system. The Examiner further suggests that a broad description of a coordinate system can be any geographical identifier that presents any area. The Examiner does not provide any support for this suggested relationship between a coordinate system and a geographical identifier.

The Examiner is failing to distinguish between coordinates and a coordinate system. A coordinate system is a system of reference to which coordinates are applied to indicate a location. The coordinate system is the frame of reference. The coordinates represent a particular location within that frame of reference.

Therefore, while a geographical identifier, which by its name and the context in which it is used in Franklin indicates that it identifies a geographical location, may be considered to be a set of coordinates, a geographical identifier clearly is not a coordinate system. This interpretation of geographical identifier is

supported by Franklin. At paragraph [0054], Franklin discloses that the proximity attribute 152 may reflect a geographical identifier for identifying a proximity of an application object 100 with respect to a coordinate system locating another object. Since the geographical identifier is used to identify a proximity of an application object 100, the geographical identifier is indicating a particular location. Since the geographical identifier indicates a particular location, the geographical identifier may be a set of coordinates, but not a coordinate system.

Furthermore, Franklin explicitly states that the geographic identifier functions with respect to a coordinate system. Since the geographical identifier functions with respect to a coordinate system, it is inherent that the geographical identifier is not a coordinate system.

Not only does the proximity attribute 152 of Franklin fail to satisfy the coordinate system requirement of the GRL tag of Applicant's claims, but neither does Franklin disclose any other structure equivalent to the GRL tag of Applicant's claims that includes a coordinate system.

In contrast, Applicant's independent claims 1, 8, and 15, as amended in Applicant's Amendment A, include wording that a global resource locator (GRL) tag is assigned to a resource, the GRL tag includes at least a description of the physical location of the resource, and the description of the physical location includes a coordinate system and coordinates for the resource. Since the attributes disclosed in Franklin do not include a coordinate system, Franklin does not disclose any structure that includes both a coordinate system and coordinates for a resource.

In view of Applicant's arguments with respect to independent claims 1, 8, and 15 being allowable, Applicant respectfully submits that the remaining dependent claims are also allowable because they contain all of the limitations of their respective independent claims and further add structural and functional limitations.

The foregoing arguments are believed to be a complete response to the most recent Examiner's Action.


No new matter has been added.

It is respectfully submitted that there is no claim, teaching, motivation, or suggestion in any of the cited art, alone or in combination, to produce what Applicant claims.

It is further submitted that the application defines patentable subject matter and that the claims are in a condition for allowance. Such allowance at an early date is respectfully requested.

Should any issues remain which would preclude the prompt disposition of this case, it is requested that the Examiner contact the undersigned practitioner by telephone.

Respectfully submitted,  
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